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6 Counsel for Secured Creditor
7 **RABO AGRIFINANCE, LLC**

8 **UNITED STATES BANKRUPTCY COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **SAN FRANCISCO DIVISION**

11
12 In re:
13 **TRINITAS ADVANTAGED AGRICULTURE**
14 **PARTNERS IV, LP, *et al.*,**
15
16 Debtor.

Case No.: 24-50211 (DM) (Lead Case)

Chapter 11

(Jointly Administered)

**NOTICE OF FILING [PROPOSED]
ORDER ON STIPULATION TO
EXTEND DEADLINE FOR RABO
AGRIFINANCE, LLC TO REPLY TO
COMMITTEE OF UNSECURED
CREDITORS' OBJECTION TO
MOTION OF DEBTORS FOR INTERIM
AND FINAL ORDERS (I)
AUTHORIZING THE DEBTORS TO
OBTAIN SENIOR SECURED,
SUPERPRIORITY, POSTPETITION
FINANCING (II) GRANTING LIENS
AND SUPERPRIORITY CLAIMS; (III)
AUTHORIZING THE USE OF CASE
COLLATERAL; (IV) MODIFYING THE
AUTOMATIC STAY; (V) SETTING A
FINAL HEARING; AND (VI)
GRANTING RELATED RELIEF**

Via Tele/Videoconference Appearance Only

Date: April 4, 2024
Time: 11:00 a.m. (PT)
Place: U.S. Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

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1 **TO THE UNITED STATES BANKRUPTCY COURT, THE OFFICE OF THE UNITED**
2 **STATES TRUSTEE, AND ALL PARTIES IN INTEREST:**

3 **PLEASE TAKE NOTICE** that secured creditor Rabo Agrifinance, LLC (“Rabo”),
4 by and through its counsel of record Fennemore Dowling Aaron; (ii) debtors and debtors in
5 possession Trinitas Advanced Agriculture Partners IV, LP; Trinitas Farming, LLC; Dixon East,
6 LLC; Turf Ranch, LLC; Rasmussen, LLC; Johl, LLC; Chiala, LLC; Hall Ranch, LLC; Porterville,
7 LLC; Tule River Ranch, LLC; Dinuba Ranch, LLC; Jeffrey Ranch, LLC; Toor Ranch, LLC; Lamb
8 Ranch, LLC; Fry Road, LLC; Adobe Ranch, LLC; Marucci Ranch, LLC; Ratto Ranch, LLC; and
9 Phelps Ranch, LLC, (collectively, the “Debtors”), by and through their counsel of record Keller
10 Benvenuti Kim LLP; and (iii) the Official Committee of Unsecured Creditors (the “Committee”),
11 by and through their proposed counsel of record Raines Feldman Littrell LLP (Rabo, Debtors, and
12 the Committee are hereinafter sometimes collectively referred to as “the Parties”) have entered into
13 a stipulation to extend the deadline for Rabo to reply to the Committee’s objection to Motion of
14 Debtors for Interim and Final Orders (I) Authorizing the Debtors to Obtain Senior Secured,
15 Superpriority, Postpetition Financing; (II) Granting Liens and Superpriority Claims; (III)
16 Authorizing the Use of Cash Collateral; (IV) Modifying the Automatic Stay; (V) Setting a Final
17 Hearing; and (V) Granting Related Relief (the “Stipulation”). [Doc# 131]

18 **PLEASE TAKE FURTHER NOTICE** that on March 28, 2024, Rabo submitted
19 an order on the Stipulation for Court approval, a copy of which is attached hereto as **Exhibit A**,
20 authorizing Rabo an extended deadline from March 28, 2024 to April 2, 2024 to reply to the
21 Committee’s objection to Motion of Debtors for Interim and Final Orders (I) Authorizing the
22 Debtors to Obtain Senior Secured, Superpriority, Postpetition Financing; (II) Granting Liens and
23 Superpriority Claims; (III) Authorizing the Use of Cash Collateral; (IV) Modifying the Automatic
24 Stay; (V) Setting a Final Hearing; and (V) Granting Related Relief (“Objection”). [Doc# 87]

25 **PLEASE TAKE FURTHER NOTICE** that copies of the pleadings in these jointly
26 administered Chapter 11 cases can be viewed and/or obtained by: (i) accessing the Court’s website
27 at <http://www.canb.uscourts.gov>; or (ii) contacting the Office of the Clerk of the Court at 450
28 Golden Gate Avenue, 5th Floor, San Francisco, California 94102.

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Note that a PACER password is needed to access documents on the Court’s website.

Dated: March 28, 2024

FENNEMORE DOWLING AARON

By: /s/ J. Jackson Waste
DON J. POOL
J. JACKSON WASTE
Counsel for Secured Creditor RABO
AGRIFINANCE, LLC

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EXHIBIT A

Proposed Order on Stipulation

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Counsel for Secured Creditor
RABO AGRIFINANCE, LLC

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
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In re:

TRINITAS ADVANTAGED AGRICULTURE
PARTNERS IV, LP, *et al.*,

Debtor.

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(Jointly Administered)

**ORDER ON STIPULATION TO
EXTEND DEADLINE FOR RABO
AGRIFINANCE, LLC TO REPLY TO
COMMITTEE OF UNSECURED
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MOTION OF DEBTORS FOR INTERIM
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FINAL HEARING; AND (VI)
GRANTING RELATED RELIEF**

Via Tele/Videoconference Appearance Only

Date: April 4, 2024
Time: 11:00 a.m. (PT)
Place: U.S. Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

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1 The court, having reviewed the *Stipulation to Extend Deadline For Rabo*
2 *Agrifinance, LLC to Reply to the Committee's Objection to Motion of Debtors for Interim and Final*
3 *Orders (I) Authorizing the Debtors to Obtain Senior Secured, Superpriority, Postpetition*
4 *Financing; (II) Granting Liens and Superpriority Claims; (III) Authorizing the Use of Cash*
5 *Collateral; (IV) Modifying the Automatic Stay; (V) Setting a Final Hearing; and (V) Granting*
6 *Related Relief* ("Stipulation") entered into by and between: (i) secured creditor Rabo Agrifinance,
7 LLC ("Rabo"), by and through its counsel of record Fennemore Dowling Aaron; (ii) debtors and
8 debtors in possession Trinitas Advantaged Agriculture Partners IV, LP; Trinitas Farming, LLC;
9 Dixon East, LLC; Turf Ranch, LLC; Rasmussen, LLC; Johl, LLC; Chiala, LLC; Hall Ranch, LLC;
10 Porterville, LLC; Tule River Ranch, LLC; Dinuba Ranch, LLC; Jeffrey Ranch, LLC; Toor Ranch,
11 LLC; Lamb Ranch, LLC; Fry Road, LLC; Adobe Ranch, LLC; Marucci Ranch, LLC; Ratto Ranch,
12 LLC; and Phelps Ranch, LLC, (collectively, the "Debtors"), by and through their counsel of record
13 Keller Benvenuti Kim LLP; and (iii) the Official Committee of Unsecured Creditors (the
14 "Committee"), by and through their proposed counsel of record Raines Feldman Littrell LLP
15 (Rabo, Debtors, and the Committee are hereinafter sometimes collectively referred to as "the
16 Parties"), filed on March 28, 2024 as Doc# 131, and find good cause, hereby issues the following
17 Order:

18 **IT IS HEREBY ORDERED, ADJUDGED, AND DECREED THAT:**

- 19 1. The Stipulation is approved.
- 20 2. The deadline for Rabo to reply to the Committee's objection to Debtors' DIP
- 21 Motion is extended from March 28, 2024 to April 2, 2024.

22 ****END OF ORDER****

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Court Service List

All Registered ECF Participants